

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JOHN BRYANT, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

MUTUAL OF OMAHA INSURANCE
COMPANY,

Defendant.

Case No. 1:22-CV-1397

**MUTUAL OF OMAHA INSURANCE COMPANY’S CONSENT MOTION FOR
EXTENSION OF TIME TO RESPOND TO THE CLASS ACTION COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 7(F)(2), Defendant

Mutual of Omaha Insurance Company (“MOI”) respectfully requests that the Court enter an Order granting MOI an extension of time of 30 days, to and including February 2, 2023, to move, answer, or otherwise respond to Plaintiff John Bryant’s Class Action Complaint. In support of this Motion, MOI states as follows:

1. Plaintiff filed this Class Action Complaint on December 7, 2022.
2. Plaintiff served the Complaint and Summons on MOI on December 13, 2022, making MOI’s responsive pleadings due on January 3, 2023.
3. Counsel for MOI was recently retained and is in the process of reviewing the Class Action Complaint allegations and relevant documents, and requires more time to investigate the matter fully and prepare an appropriate response. Accordingly, MOI requests an extension of time to respond to the Class Action Complaint. MOI has not

requested or received any prior extensions.

4. The undersigned has communicated with counsel for Plaintiff, who is agreeable to a 30-day extension. A proposed Consent Order is attached as **Exhibit A**.

WHEREFORE, Defendant MOI respectfully requests that this Court grant it up to and including February 2, 2023 to respond to the Class Action Complaint.

Dated: December 27, 2022

Respectfully submitted,

/s/ Amy Brown Doolittle
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Counsel for Mutual of Omaha Insurance Company

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was electronically filed with this Court's CM/ECF system on this 27th day of December, 2022, and accordingly served automatically upon all counsel of record for this matter.

/s/ Amy Brown Doolittle
Amy Brown Doolittle (VSB #37824)